

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

3:17-CR-358 (TJM)

v.

ROLAND KYZER,

STIPULATION

Defendant.

STIPULATION

It is hereby stipulated and agreed, by and between the defendant as represented by counsel's signature below, and Grant C. Jaquith, United States Attorney for the Northern District of New York, by Miroslav Lovric, Assistant United States Attorney, that the following facts are stipulated to and agreed to by both parties, and also that if witnesses were called to testify about these matters they would testify in accordance to the below stipulated facts.

STIPULATED FACTS:

- (1) "img_3611_1.jpg" was produced in Chisinau, Republic of Moldova, which is outside New York state and it was produced in or after 2004.
- (2) "tara 5yr 032 [REAL 5yo REALLY doing IT and REALLY getting off~LogicalReality.com].jpg" was produced in Lafayette, Georgia, which is outside New York state and it was produced in or after 2004.
- (3) "2_yo_oral_in_bath.avi" was produced in Kennewick, Washington, which is outside New York state and it was produced in or after 2003.
- (4) "2008_Littleangela.avi" was produced in Ayden, North Carolina, which is outside New York state and it was produced in 2008.
- (5) "Pthc (2015) 7Yo April Hj Bj Finger Pencil In Ass Vib Cum.mp4" was produced in Sioux City, Iowa, which is outside New York state and it was produced in or after 2009.

(6) "My_family_incest_Seri_2011_Julia_8yo_Lisa_4yo_Mike_7yo_Lara_8yo_hot_30min.avi" was produced in Marjorca, Spain, which is outside New York state and it was produced in or after 2008.

(7) "Emily girl masturbation pthc toys webcam.avi" was produced in Ste. Genevieve, Missouri, which is outside New York state and it was produced in 2010.

Dated: February 12, 2018

GRANT C. JAQUITH
Acting United States Attorney

Miroslav Foric
Assistant U.S. Attorney



Courtenay McKeon, Esq.
Attorney for defendant Roland Kyzer